

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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LGN INTERNATIONAL, LLC, and,
PRUDENT INVESTIMENTOS LTDA,

No. 21-cv-940-WMS

Plaintiffs,

- against -

HYLAN ASSET MANAGEMENT, LLC,
ANDREW SHAEVEL,
BAHAMAS MARKETING GROUP,
JOEL TUCKER,
SQ CAPITAL, LLC,
JT HOLDINGS, INC.,
HPD LLC,
HIRSCH MOHINDRA,
MAINBROOK ASSET PARTNERS I, LLC,
WORLDWIDE PROCESSING GROUP LLC,
FRANK A. UNGARO, and
BOBALAW VENTURES,

Defendants.

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SWORN DECLARATION OF DENNIS C. VACCO, ESQ.

I, Dennis C. Vacco, declare as follows:

1. I am an attorney and partner of Lippes Mathias LLP, attorneys for Defendants Hylan Asset Management, LLC, Andrew Shaevel, Mainbrook Asset Partners I, LLC, Hylan Debt Fund LLC (improperly sued as “Hyland Debt Fund LLC”), and Bobalew Ventures (improperly sued as “Bobalaw Ventures) (collectively “Moving Defendants”) in this matter.

2. I am familiar with the facts and circumstances in this case.

3. I make this declaration in support of Moving Defendants’ motion to dismiss pursuant to Fed.R.Civ.Pro. 12(b)(6).

4. In support of the motion, I include for the Court's consideration a Plea Agreement of Joel Tucker (Exhibit 1), Declaration of Andrew Shaevel (Exhibit 2), and Memorandum of Law.

Pursuant to the requirements of 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: Buffalo, New York
October 29, 2021

s/ Dennis C. Vacco
Dennis C. Vacco
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